



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 19, 2016

REPLY TO THE ATTENTION OF:

LU-9J

Ms. Teri Kirk
Environmental Management Department
ArcelorMittal Burns Harbor, LLC
250 W. U.S. Highway 12
Burns Harbor, Indiana 46304-9745

RE: Progress Report and Termination Request
Locomotive Fueling Station
ArcelorMittal Burns Harbor (AMBH), LLC.
IND 003 913 423

Dear Ms. Kirk:

EPA has reviewed your August 19, 2015 letter and enclosed Progress Report and request to terminate active diesel fuel recovery efforts at the Locomotive and Mobile Equipment Shop and financial assurance for this remedial effort.

A subsurface release of diesel fuel was discovered north of the Locomotive and Mobile Equipment Shop during a construction project in December 2007. AMBH removed impacted soils and has been operating a free product recovery system utilizing vacuum enhanced in-well skimming technology since 2009.

In response to your request to terminate the operation of the active free product recovery system, EPA offers the following:

- 1) AMBH may shut down the active recovery system. As mobile/recoverable free product still seems to be present in the areas of RW-3 and RW-4 (apparent thickness of free product increased up to 4 inches during the period when the skimmer pumps were off in 2015), EPA requests AMBH keep the system at the site on standby status as you observe the potential for additional rebound of free product in the recovery wells. Should rebound occur, AMBH may elect to restart the recovery system or use passive recovery techniques, such as absorbent socks, until such time that no additional free product is observed within the wells for four consecutive quarterly inspection events. Please also submit any additional "Quarterly Progress Reports" or recovery data collected since June 2015.

- 2) In the July 31, 2008 Corrective Action Completion Report, the Conclusions and Recommendations section discusses the use of piezometers to check for the presence of remaining liquid diesel fuel and that the results would be provided under separate cover. Can you please provide the results of that investigation? We would like to know whether the areas down gradient of the excavation and existing recovery wells were investigated for the presence of free product and groundwater contamination. If not, we would request that AMBH perform such an investigation to confirm no down gradient impacts. Additionally, how many rounds of groundwater data do you have from the wells in this area?
- 3) With respect to your request to no longer maintain financial assurance for this remedial effort, AMBH may adjust the cost estimate for financial assurance as needed to reflect the above conditions as part of the next annual update of the financial assurance mechanism under the Underground Injection Control Permit issued on September 30, 2010 (e.g. keeping the active recovery unit on standby status or implementing passive recovery techniques; potential investigation for down gradient impacts).

AMBH must continue to maintain financial assurance for the maintenance of the engineering control (cap) at the Rectangular and Circular Tar Impoundments (IA-3) per Condition C.4, Attachment F of the EPA issued Underground Injection Control Permits issued on September 30, 2010. Nothing in this letter shall be interpreted as prohibiting us from taking any actions necessary to protect human health and the environment, including ordering additional corrective action if necessary.

If you have any further questions regarding this matter, please feel free to contact me at (312) 886-7890 or via email at ramanauskas.peter@epa.gov.

Sincerely,



Peter Ramanauskas
Project Manager
RCRA Corrective Action Section 1
Remediation and Reuse Branch
Land and Chemicals Division